

TECHNICAL REVIEW DOCUMENT
For
RENEWAL / MODIFICATION TO OPERATING PERMIT 02OPPR251

C.F. Maier Composites, Inc.
Prowers County
Source ID 0990036

Prepared by Blue Parish
June - September 2009

I. Purpose:

This document establishes the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal and modification of the Operating Permit for the C.F. Maier Composites, Inc. facility. The current Operating Permit for this facility was issued on September 1, 2004 and expires on September 1, 2009. Prior to submittal of the renewal application, the source had submitted an application on February 10, 2009 to revise their Title V permit to include the Garmat spray paint booth. Since this modification involves significant changes to existing monitoring, reporting, or record keeping requirements, the modification must be processed as a significant modification as required by Colorado Regulation No. 3, Part C, Section I.A.7.f. A significant modification is processed under the same procedures as a renewal, i.e. it must go through a 30-day public comment period and EPA 45-day review period. Therefore, since the renewal application has been submitted the Division is incorporating the modification with the renewal.

This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the source's request for a modification submitted on February 10, 2009, the renewal application submitted on April 8, 2009, additional information submitted on June 24, 2009 and July 27, 2009, comments on the draft permit submitted on August 27, 2009 and September 11, 2009, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant's consultant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall

be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Source

The facility manufactures custom molded parts from fiberglass reinforced-polyester. The process includes spraying gelcoat in open molds, then laying up fiberglass reinforcement, impregnated with polyester resin. Lay up is accomplished manually and by non-atomized application. Surface coating of some finished products is completed in an enclosed spray booth, equipped with a heater and filters.

The technical review document for the original Operating Permit noted that there is a potential to use 5 tons per year of acetone for cleanup. A distillation process is used to recycle the acetone. Acetone is not classified as a volatile organic compound or a hazardous air pollutant.

The facility is located at 500 East Crystal Street in Lamar, Colorado. The area in which this facility is located is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM10). Under that classification, all SIP-approved requirements for PM10 will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. Kansas is an affected state within 50 miles of this facility. There are no Federal Class I designated areas within 100 kilometers of this facility.

There are no other Operating Permits associated with this facility.

Facility wide emissions are as follows (tons/year):

<u>Pollutant</u>	<u>Actual</u>	<u>Potential</u>
Volatile Organic Compounds (VOC)	18.9	80
Total Hazardous Air Pollutants (HAP)	17.6	>25
Styrene	15.8	>10

Actual emissions are based on 2008 data. Potential VOC emissions are based on Operating Permit limits.

Based on the information provided by the applicant, this source is categorized as a minor stationary source for PSD as of the issue date of this permit. Any future modification which is major by itself (Potential to Emit of ≥ 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

Applicable Requirements

Compliance Order on Consent (Case No. 2008-090)

The facility entered into a Compliance Order on Consent (COC) on October 22, 2008. The order required the facility to comply with the existing operating permit (paragraph 11) and to work with the Division to obtain the appropriate permit for the Garmat Paint booth (paragraph 12). The renewal permit includes the Garmat Paint Booth, therefore no permit conditions addressing the COC are required.

Case-by-Case MACT - 112(j) (40 CFR Part 63 Subpart B §§ 63.50 thru 63.56)

Under the federal Clean Air Act (the Act), EPA is charged with promulgating maximum achievable control technology (MACT) standards for major sources of hazardous air pollutants (HAPs) in various source categories by certain dates. Section 112(j) of the Act requires that permitting authorities develop a case-by-case MACT for any major sources of HAPs in source categories for which EPA failed to promulgate a MACT standard by May 15, 2002. These provisions are commonly referred to as the “MACT hammer”.

Owner or operators that could reasonably determine that they are a major source of HAPs which includes one or more stationary sources included in the source category or subcategory for which the EPA failed to promulgate a MACT standard by the section 112(j) deadline were required to submit a Part 1 application to revise the operating permit by May 15, 2002. Since the EPA has signed off on final rules for all of the source categories which were not promulgated by the deadline, the case-by-case MACT provisions in 112(j) no longer apply. Note that there is a possible exception to this, as discussed later in this document (see under industrial, commercial and institutional boiler and process heaters).

Industrial, Commercial and Institutional Boilers and Process Heaters MACT (40 CFR Part 63 Subpart DDDDD)

The final rule for industrial, commercial and institutional boilers and process heaters was signed on February 26, 2004 and was published in the Federal Register on September 13, 2004. There is a small process heater included in the insignificant activity list in Appendix A of the permit. Although 40 CFR Part 63 Subpart DDDDD applies, new (constructed after January 13, 2003) small gaseous fired units are not subject to any of the requirements in 40 CFR Part 63 Subparts A and DDDDD, including the initial notification requirements (§ 63.7506(c)(3)). The process heater at this facility that is listed in the insignificant activity list would fall under the new small gaseous fired unit category and would therefore not be subject to any requirements.

As of July 30, 2007, the Boiler MACT was vacated; therefore, the provisions in 40 CFR Part 63 Subpart DDDDD are no longer in effect and enforceable. The vacatur of the Boiler MACT triggers the case-by-case MACT requirements in 112(j), referred to as the MACT hammer, since EPA failed to promulgate requirements for the industrial,

commercial and institutional boilers and process heaters by the deadline. Under the 112(j) requirements (codified in 40 CFR Part 63 Subpart B §§ 63.50 through 63.56) sources are required to submit a 112(j) application by the specified deadline. As of this date, EPA has not set a deadline for submittal of 112(j) applications to address the vacatur of the Boiler MACT. It is not clear whether 112(j) applications would be required for the small process heaters that were affected sources under the Boiler MACT but were not subject to any requirements. Therefore, the Division has not included a requirement in the permit to submit a 112(j) application. If the Division considers that in the future, a 112(j) application will be required for small units the source will be notified.

Reinforced Plastics Composite Production MACT (40 CFR 63 Subpart WWWW)

According to the previously issued permit and technical review document and information submitted by the applicant, the facility is an existing source that includes the following operations that are subject to MACT WWWW as defined in 40 CFR 63.5790(b): open molding, mixing, cleaning of equipment used in reinforced plastics composite manufacture and HAP-containing materials storage. The facility also includes the following operations that are specifically excluded from requirements in MACT WWWW as defined in 40 CFR 63.5790(c): application of mold sealing and release agents, mold stripping and cleaning and repair of parts not manufactured at the facility. The facility does not include centrifugal casting or continuous lamination/casting operations.

MACT WWWW was initially published in the federal register on April 21, 2003, but was subsequently amended on August 25, 2005 (70 FR 50124). The most recent issuance of the Operating Permit (September 1, 2004) does not include the amended requirements. Changes to the rule that are relevant to operations at this facility include:

- Removal of the highest organic HAP content for compliant materials shown in Table 3 (included in the 9/1/2004 Operating Permit as condition 1.4.9). EPA notes in the preamble to the amendment that the purpose for including these values in the original rule was to provide examples of compliant materials and that they were not to be construed as emission limits or HAP content limits. The amended rule removes the highest HAP content column from Table 3, and reorganized the discussion of compliance options in 63.5810 (included in the 9/21/2004 Operating Permit as conditions 1.4.11, 1.4.12 and 1.4.13).
- Modification of 63.5810 to allow facilities to demonstrate compliance for some resins and gel coats using averaging, while demonstrating that other materials can comply individually, as applied. EPA notes in the preamble to the amendment that the wording of the previous rule would force all materials to be averaged together unless each and all of them met the emission limit individually, which was not the original intent. The 9/1/2004 operating permit did not include the option for showing compliance for some materials on an individual, as-applied basis.
- Addition of paragraph (i) to 63.5910 specifying how a source is to report changing compliance options.

- Correction of numerical errors in equation 1.f of Table 1 and rounding errors on emission limits for some of the processes in Table 3.
- Removal of the manual gel coat equation in Table 1, and revision of the footnote concerning manual gel coat application in Table 3 to make it clear that to demonstrate compliance for manually applied gel coat, it should be treated as if it were applied using spray equipment.

In addition to changes in the rule, the following issues were identified with the MACT WWW permit conditions in the 9/1/2004 Operating Permit:

- Condition 1.4 includes a 100 ton per year limit on organic HAP emissions, referencing 63.5799(b)(1). The purpose of section 63.5799 is to specify the calculation procedures for total facility organic HAP emissions in order to determine which of the standards in 63.5805 apply (certain requirements in 63.5805 apply only to facilities with emissions greater than 100 tpy organic HAP). However, the requirements of 63.5805 for existing facilities that do not have centrifugal casting or continuous laminating/casting operations are fixed and are not dependent on whether HAP emissions are below 100 tpy. Section 63.5799 includes the following: “You are not required to calculate or report emissions under this section if you are an existing facility that does not have centrifugal casting or continuous lamination/casting operations...” Therefore, the 100 tpy HAP limit and conditions referencing 63.5799 have been removed.
- Condition 1.4.8 states that the compliance date for this facility was April 21, 2006. This is also the date that data collection commences for purposes of demonstrating compliance with the 12-month rolling average emission standard. The initial compliance demonstration was due 30 days after the end of April 2007. The September 24, 2008 inspection report notes that the facility began collecting data on April 1, 2006 and demonstrated compliance with on May 1, 2007. Therefore, this condition will be removed from the renewal permit.
- Condition 1.4.13 incorrectly states that 63.5810(d) requires compliance with the maximum organic HAP content. The rule requires compliance with HAP emission limits, not HAP content (see discussion of how EPA clarified the rule, above).
- Condition 1.4.15 includes work practice standards from 63.5835(c), which require the facility to submit certified statements in the Notice of Compliance Status regarding the work practice requirements for cleaning solvents, HAP-containing material storage operations and mixing operations. The September 24, 2008 inspection report notes that these statements were included in the Notice of Compliance Status addendum that was received by the Division on September 19, 2008. This initial requirement is therefore satisfied and will not be included in the renewal permit.
- Condition 1.4.17 requires that an Applicability Notification required under 63.5905 be submitted by August 19, 2003. The September 24, 2008 inspection report notes that this notification was submitted on May 28, 2003. This initial requirement is therefore satisfied and will not be included in the renewal permit.
- Condition 1.4.18 requires that the Notification of Compliance Status required under 63.5905 showing compliance with the HAP emission limit averaging

provisions be submitted no later than 1 year plus 30 days after April 21, 2006. The September 24, 2008 inspection report notes that this notification was submitted on August 22, 2008. This initial requirement is therefore satisfied and will not be included in the renewal permit.

- Conditions 1.4.12 incorrectly states that the Material_i term to be used in the equation includes all HAP containing materials used; the rule notes that Material_i is actually only the neat resin plus or neat gel coat plus used. The renewal permit contains the language as it is stated in the MACT rule.
- Table 1 of MACT WWW shows calculations used for Organic HAP Emission Factors for both vapor-suppressed and nonvapor-suppressed resins. Based on the compliance information submitted by the facility on June 24, 2009, the facility has not used any vapor-suppressed resins. It should be noted that if the facility uses vapor-suppressed resins in the future, the vapor suppressant effectiveness (VSE) must be determined through testing methods according to 63.5810(a) prior to using any of the equations for vapor-suppressed resins in Table 1.

Surface Coating of Plastic Parts and Products MACT (40 CFR 63 Subpart PPPP)

C.F. Maier began operation of a Garimat Model Tier I custom built paint booth for the purpose of completing surface coating operations of plastic parts and products in December 2006 (subject to Subpart PPPP). The facility submitted a construction permit application on April 12, 2007, which was determined by the Division to be incomplete as it did not show compliance with the requirements of Subpart PPPP. An amended application was received in May 2007 that also did not show compliance with the requirements of Subpart PPPP. The Division issued a Compliance Order on Consent (Case No. 2008-090) requiring C.F. Maier to work with the Division to modify the Operating Permit to include the Garimat paint booth. On December 10, 2008, the Division requested that C.F. Maier submit a complete application for a significant modification to the operating permit based on the newest information indicated in the Initial Notification under Subpart PPPP, submitted on September 30, 2008. This application was received on February 10, 2009.

Subpart PPPP addresses four different subcategories of coating operations related to the surface coating of plastic parts and products, and includes different standards for each subcategory: (1) general use coating, (2) automotive lamp coating, (3) thermoplastic olefin coating and (4) assembled on-road vehicle coating. Based on the information in the application, the facility intends to coat parts/objects that are subject to the general use requirements and the assembled on-road vehicle coating requirements.

Subpart PPPP also includes several compliance options, including a compliant materials option, and options for meeting an emission rate standard with or without add-on controls. C.F. Maier indicated in the Notification of Compliance Status Report (NOSCR) dated September 30, 2008 that the compliance option used at the facility is the emission rate without add-on controls. Subpart PPPP includes options for facilities conducting operations under more than one of the subcategories described above,

including complying with individual standards for each subcategory, determining a predominant use subcategory, or calculating and complying with a facility-specific emission limit that covers all surface coating operations. Based on the information in the NOSCR, C.F. Maier has chosen to comply with the facility-specific emission limit.

The renewed Operating Permit will include Subpart PPPP requirements as new condition 2.6 in Section II. In addition to the issues related to facility operations and compliance options discussed above, the following information is relevant to the determination of Subpart PPPP requirements in Condition 2.6:

- The general use or TPO predominant activity compliance option in Section 63.4490(c)(1) is not included in the permit as the determination required for this option was not included in the facility's initial notification report.
- 63.4491 includes three different compliance options for meeting the emission limits, and allows the facility to use different compliance options at different times and to switch between the operations under certain circumstances. The facility has indicated that it intends to comply with the emission rate without add-on controls option. However, it is conceivable that based on potential future changes to material formulations, the facility may be able to comply with the compliant materials option for one or more coating operations. Therefore, the Division is including both of these options in the Compliance Plan for Subpart PPPP as Appendix J to the permit. The compliance option requiring add-on controls is not being included in the permit at this time because no controls are currently installed at the facility.
- 63.4510(b) requires the submittal of an initial notification. The source submitted this notification on September 30, 2008; therefore this requirement is not included in the permit.
- 63.4510(c) requires the submittal of the Notification of Compliance Status report. The source submitted this notification on September 30, 2008; therefore this requirement is not included in the permit.
- The Division included Condition 2.2 in the permit, which requires the facility to keep records associated with each type of part coated in the paint booth, including the applicable Subpart PPPP subcategory, the Subpart PPPP compliance option chosen and the names of materials (coatings, thinners additives and cleaning materials) that are used for that type of part. The purpose of these records is to aid in the Subpart PPPP compliance demonstration (i.e., to ensure that the appropriate emission limits are used for each subcategory, to ensure that requirements that are specific to certain types of materials are appropriately identified, etc.).

Other MACT Requirements

Subpart IIII—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks (40 CFR 63 Subpart IIII). The facility performs coating activities on parts that will be attached to on-road vehicles (i.e., Jeep toppers). However, the facility meets the exemptions of 40 CFR 63.3081(b)(1): the coating operation is located at plastic or composites molding facility, all of the body parts topcoated at the facility were fabricated at the facility and none of the new vehicles in which the body parts are used are assembled at the facility and all of the body parts for any single new automobile or new light-duty truck are not topcoated at the facility.

Subpart HHHHH - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing. The facility does not manufacture coatings, and is therefore not subject to these requirements.

Subpart HHHH – National Emission Standards for Hazardous Air Pollutants for Wet-Formed Fiberglass Mat Production. The facility does not produce fiberglass mat by bonding glass fibers to each other using a resin solution, and is therefore not subject to these requirements

Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The facility is a major source of HAPs; therefore these requirements do not apply.

Subpart MMMM – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. The facility conducts some coating of metal parts in the Garmat paint booth. Subpart MMMM applies to sources using more than 250 gallons per year of HAP-containing coatings for the purpose of coating miscellaneous metal parts and products. CF Maier does not use more than 250 gallons per year of HAP-containing coatings on such activities; therefore Subpart MMMM does not apply.

New Source Performance Standards

Subpart MM - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. This subpart applies to certain operations in automobile or light-duty truck assembly plants. The facility is not an auto or light-duty truck assembly plant; therefore this requirement does not apply.

Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing. This subpart applies to rotogravure printing lines used to print or coat flexible vinyl or urethane products. The facility does not conduct these activities; therefore these requirements do not apply.

Subpart TTT - Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines. The facility does not coat plastic parts

that are used in the manufacture of business machines as defined under the subpart; therefore these requirements do not apply.

Subpart VVV - Standards of Performance for Polymeric Coating of Supporting Substrates Facilities. The facility does not use a web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil. Therefore these requirements do not apply.

Colorado Regulation No. 7

This source is subject to the state-wide requirements of Regulation No. 7 (Control of Ozone via Ozone Precursors). Reg 7 Section V prohibits the disposal of VOCs by evaporation or spillage unless RACT is applied. This requirement is included in Condition 29 of the General Permit Conditions Section (Section IV).

Compliance Assurance Monitoring (CAM) Requirements

The facility does not use any control devices to meet emission limits or standards; therefore the facility is not subject to CAM requirements.

III. Discussion of Modifications Made

Source Requested Modifications

The source submitted an application to modify their permit on February 10, 2009. In addition, the source submitted a renewal application on April 8 2009 with additional information submitted on June 24, 2009. In their renewal application, the source indicated that they were requesting the changes identified in their February 10, 2009 modification application.

The source's requested modifications identified in the modification request and the renewal application were addressed as follows:

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In the renewal application, the source indicated a new permit contact person and new contact phone numbers; the permit was revised accordingly.

Garmat Model I Spray Paint Booth (Section II, Condition 2)

Surface coating of certain products fabricated at the facility is accomplished in the Garmat paint booth. The paint booth is equipped with filters and a 1 MMBtu/hr indirect natural gas-fired heater. VOC and HAP emissions from the booth are calculated using a mass-balance approach. VOC and HAP content of the materials applied is based on information from the manufacturers, and no control is assumed. Based on the supplemental information submitted with the Notification of Compliance Status report for Subpart PPPP, PM and PM10 uncontrolled emissions from the solids in the materials

applied are below APEN reporting thresholds. The Garmat Spray Paint Booth is being incorporated into this renewal permit as a significant modification as per the combined construction/operating permit application procedures in Colorado Regulation No. 3, Part C, Section III.B.

Section I of the permit was updated to include the paint booth:

- Condition 1.1 – updated the permitted activities description to include the new surface coating spray booth.
- Condition 5.1 – Added new Garmat surface coating spray booth to summary of emission units table.

The APEN received on February 10, 2009 requested a permitted emission limit of 20 tons of VOC per year. This limit is incorporated as Condition 2.1 of Section II.

The odor requirements in Section II, Condition 1.3 (applicable to Fiberglass Fabrication) are also applicable to the paint booth. The language in Condition 1.3 is therefore included for the paint booth as new condition 2.3 in Section II.

The paint booth has the potential to emit particulate emissions due to overspray, and is equipped with a filter to minimize such emissions. Sources of particulate matter are subject to the opacity requirements of Colorado Regulation No. 1. These requirements are included as new condition 2.4. Note that Colorado Regulation No. 1, Section II.A.4 includes a 30% opacity requirement during periods of the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment. The Division determines that for a paint booth, startup, fire building, cleaning of fire boxes and soot blowing do not apply, and that process modifications and adjustment or cleaning of the control devices will not occur while the booth is in operation. Therefore, the 30% opacity requirement is not included. Due to the requirements to operate and maintain the filter associated with the booth (new condition 2.5 in Section II), compliance with the opacity requirements may be presumed in absence of any credible evidence to the contrary.

As described above, the paint booth is subject to 40 CFR 63 Subpart PPPP. The requirements are included as condition 2.6 in Section II, and the applicable compliance options of Subpart PPPP are included as the compliance plan in Appendix J.

Appendix A

The source questioned whether the resin storage tanks should be listed as an insignificant activity (four (4) 2,200 gallon resin storage tanks are currently in operation, and the facility may be installing two additional similar tanks in the near future). The Division confirmed that the resin tanks do not qualify as insignificant activities because they are affected sources under the fiberglass MACT, and therefore need to be included in the permit as emission points. Under both the MACT and the operating permit, Fiberglass Fabrication is treated as a collection of activities and equipment that is not necessarily fixed or constant (i.e., the number of application stations or mixing vessels is neither specified nor limited). The Division considers that the existing resin tanks plus

any future resin tanks are addressed by work practice requirements in the MACT, and the emissions are automatically accounted for by the UEF factors (which are based on total throughput and account for all emissions from Fiberglass Fabrication operations). Permitted emission limits are therefore protected by the permitted throughput limits, regardless of the number of resin tanks, application stations, mixing vessels, etc.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal. These changes are as follows:

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- Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

Section I – General Activities and Summary

- Updated language in Condition 1.2 to reflect PM10 attainment/maintenance classification for Lamar.
- Updated language in Condition 1.5 (listing of State-only enforceable conditions).
- Updated Condition 3 to reflect PM10 attainment/maintenance classification for Lamar, and to include current Division language regarding PSD applicability.
- Corrected AIRS ID for fiberglass manufacturing from 999 to 002 in Summary of emission units table.
- Updated description of fiberglass fabrication activities in Table 5.1 to include associated activities that are addressed under MACT WWW.

Section II – Specific Permit Terms

- Removed language at the beginning of Section II related to Reg 3 compliance as these requirements are addressed in the General Conditions.

- Reworded first paragraph of Condition 1.1 to clarify that emission factors are in Appendix G.
- Reworded Condition 1.2 to reference the material consumption limits rather than the emission limits.
- Condition 1.3 includes a reference to construction permit no. 01AD0798 – this has been corrected to 02PR0542. Noted this condition as state-only enforceable (odor requirements of Regulation No. 2).
- Condition 1.4 - Based on the changes to the 40 CFR 63 Subpart WWWW and the issues described above, the entire Subpart WWWW condition will be rewritten to incorporate the appropriate changes. The applicable compliance options of Subpart WWWW are included as the compliance plan in Appendix I.
 - 63.5895(d) allows that resin and gel coat use records are not required to be maintained for individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limit as defined in 63.5810(a). However, consumption of materials is required to be tracked in order to comply with other conditions of the permit not related to MACT WWWW (material consumption limits and emission calculation requirements). Therefore, this portion of 63.5810(a) has been streamlined out.
 - 63.5810(d) allows that resin use records are not required to be maintained for individual resins where compliance is demonstrated by meeting the HAP emission limits in Table 7 of Subpart WWWW. However, consumption of materials is required to be tracked in order to comply with other conditions of the permit not related to MACT WWWW (material consumption limits and emission calculation requirements). Therefore, this portion of 63.5810(d) has been streamlined out.

Section III – Permit Shield

- Revised the citation to reflect revisions and restructuring of Reg 3 and remove Reg 3, Part C, Section V.C.1.b and C.R.S. § 25-7-111(2)(l) since they don't address the permit shield.

Section IV – General Conditions

- Updated the General Conditions to the Division's current version (07/21/2009)

Appendices

- Updated the information in Appendix A to reflect changes to required safety equipment, the facility plot plan and the list of insignificant activities. Included the 1 MMBtu/hr heater associated with the Garmat paint booth that was noted on the APEN for that unit.

- Removed the Appendix A insignificant activity listing for “fuel storage and dispensing equipment in ozone attainment areas operated solely for company owned vehicles where the daily fuel throughput is no more than 400 gallons per day, averaged over a 30 day period” as this equipment was observed to not be present during the Division’s inspection on July 14, 2009.
- The source’s consultant noted in an email received by the Division on 6/24/2009 that there are no emergency generators or any other stationary fuel fired engines at the facility. Therefore, the categorical stationary combustion engine language was removed from the list of Insignificant Activities.
- The source’s consultant noted in an email received by the Division on 7/27/2009 that particulate matter sources at the facility are less than APEN reporting thresholds (2 tons per year). The Division added these sources (sanding, cutting and chopper gun fiber application) to the list of insignificant activities in Appendix A.
- Appendix B and C were replaced with the latest versions, and to include the new paint spray booth in the reporting tables
- EPA’s mailing address was revised (Appendix D).
- Included new Appendices I and J (Compliance Plans for MACT WWWW and PPPP requirements, respectively) as discussed above.